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*Counsel for Lehman Brothers Holdings Inc.
and Certain of Its Affiliates*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., et al.,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
-----X	

**CERTIFICATE OF NO OBJECTION
UNDER 28 U.S.C. § 1746 REGARDING OMNIBUS
CLAIMS OBJECTION SCHEDULED FOR HEARING ON DECEMBER 19, 2013**

TO THE HONORABLE JAMES M. PECK
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures entered on June 17, 2010 [Docket No. 9635] (the "Second Amended Case Management Order"), the undersigned hereby certifies as follows:

1. Lehman Brothers Holdings Inc. ("LBHI"), as Plan Administrator pursuant to the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors, filed the following omnibus claims objection (the "Claim Objection") with the Court for hearing on November 21, 2013:

Four Hundred Forty-Fifth Omnibus Objection to Claims (No Liability Claims) [**Docket No. 40479**].

2. In accordance with the Second Amended Case Management Order, LBHI established a deadline of November 14, 2013 at 4:00 p.m. (the “Response Deadline”) for the Claim Objection for parties to object or file responses. On November 19, 2013, LBHI filed the Notice of Adjournment of the Four Hundred Forty Fifth Omnibus Objection to Claims (No Liability Claims) [**Docket No. 41175**], which adjourned the hearing for the Claim Objection to December 19, 2013 at 10:00 a.m. The Response Deadline was also rescheduled to December 6, 2013 at 4:00 p.m. (the “Adjourned Response Deadline”). The Second Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections or other responsive pleadings have been filed on or prior to the relevant response deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.

3. The Adjourned Response Deadline has now passed and, to the best of my knowledge, no responsive pleadings to the Claim Objection have been (a) filed with the Court on the docket of the above-referenced cases in accordance with the procedures set forth in the Second Amended Case Management Order, or (b) served on LBHI’s counsel by any of the holders of the claims included in Exhibit 1 to the Order attached hereto, which includes only the proofs of claim for which the Claim Objection will be granted.

4. Accordingly, LBHI respectfully requests that the proposed order granting the Claim Objection annexed hereto as Exhibit A, which is unmodified since the filing of the Claim Objection, be entered in accordance with the procedures described in the Second Amended Case Management Order.

I declare that the foregoing is true and correct.

Dated: December 9, 2013
New York, New York

**CURTIS, MALLET-PREVOST,
COLT & MOSLE LLP**

By: /s/ L. P. Harrison 3rd
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EXHIBIT A

(Proposed Order – Docket No. 40479)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : **Chapter 11 Case No.**
 :
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (JMP)**
 :
Debtors. : **(Jointly Administered)**
-----X

**ORDER GRANTING THE FOUR HUNDRED FORTY-FIFTH
OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)**

Upon the four hundred forty-fifth omnibus objection to claims, dated October 15, 2013 (the “Four Hundred Forty-Fifth Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors for certain entities in the above-referenced chapter 11 cases (collectively, the “Chapter 11 Estates”), pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim (Docket No. 6664) (the “Procedures Order”), seeking disallowance and expungement of the No Liability Claims, all as more fully described in the Four Hundred Forty-Fifth Omnibus Objection to Claims; and due and proper notice of the Four Hundred Forty-Fifth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Four Hundred Forty-Fifth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and factual bases set forth in the Four Hundred Forty-Fifth Omnibus Objection to Claims establish just cause

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred Forty-Fifth Omnibus Objection to Claims.

for the relief granted herein; and after due deliberation and sufficient cause appearing therefore,
it is

ORDERED that the relief requested in the Four Hundred Forty-Fifth Omnibus
Objection to Claims is granted; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims
listed on Exhibit 1 annexed hereto (collectively, the “No Liability Claims”) are disallowed and
expunged with prejudice; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the
validity, allowance, or disallowance of, and all rights to object and defend on any basis are
expressly reserved with respect to, any claim listed on Exhibit A annexed to the Four Hundred
Forty-Fifth Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto; and it is
further

ORDERED that this Court shall retain jurisdiction to hear and determine all
matters arising from or related to this Order.

Dated: _____, 2013
New York, New York

UNITED STATES BANKRUPTCY JUDGE

EXHIBIT 1

OMNIBUS OBJECTION 445: EXHIBIT A - NO LIABILITY CLAIM

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	REASON FOR PROPOSED DISALLOWANCE
1 DEUTSCHE BANK AG, LONDON	08-13901 (JMP)	Lehman Brothers Commercial Corporation	09/14/2009	12476	\$38,887,154.16	\$38,887,154.16	Claim arises out of a Swap Agreement (as such term is defined in Claim No. 12476) among Lehman Brothers Inc. ("LBI") and Auriel Capital Management LLP and/or certain of its affiliates. LBCC has no liability in connection with the Swap Agreement. Furthermore, the Plan Administrator understands that claimant has already been paid in full in LBI's proceeding under the Securities Investor Protection Act.
2 DEUTSCHE BANK AG, LONDON	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/14/2009	12477	\$38,887,154.16	\$38,887,154.16	Claim is based on LBHI's alleged obligations under a 2005 resolution of LBHI's board of directors purporting to guarantee LBCC's obligations. As described above, LBCC is not liable to claimant. Consequently, LBHI has no liability to claimant on account of the alleged guarantee.
TOTAL					\$77,774,308.32	\$77,774,308.32	